

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LAZAR MACOVSKI, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

GROUPON, INC., RICH WILLIAMS, and
MELISSA THOMAS,

Defendants.

Case No. 1:20-cv-02581

Honorable Matthew F. Kennelly

Telephonic Hearing Date: October 13, 2022

Time: 9:00 a.m.

**LEAD PLAINTIFF'S MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION**

Court-appointed Lead Plaintiff Fadi E. Rahal hereby respectfully moves the Court for an Order: (i) granting final approval of the Settlement¹ in the above-captioned action; and (ii) approving the proposed Plan of Allocation for distribution of the Settlement Fund. Defendants do not oppose the relief requested by this Motion.

The grounds in support of this Motion are set forth fully in the concurrently-filed Memorandum of Law in Support of Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation; and the Joint Declaration of Leanne H. Solish and Thomas W. Elrod in Support of: (I) Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (II) Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses, and the exhibits attached thereto.

Dated: September 8, 2022

Respectfully Submitted,

GLANCY PRONGAY & MURRAY LLP

By: /s/ Leanne H. Solish

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¹ All capitalized terms used herein that are not otherwise defined have the meanings ascribed to them in the Stipulation and Agreement of Settlement, dated June 24, 2022 (ECF No. 110-1).

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Liaison Counsel for Lead Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on September 8, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered ECF participants.

s/ Leanne H. Solish
Leanne H. Solish